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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 Erick Navarro,

11 Plaintiff,

12 v.

13 Russell Road Food and Beverage,
14 LLC *dba* Crazy Horse 3 Gentlemen's
15 Club, et al,

16 Defendants.

Case No.: 2:20-cv-00129-JAD-BNW

**Stipulation to extend time for
Plaintiff to respond to motion to
dismiss**

(First request)

ORDER

17
18 Erick Navarro (“Plaintiff”) and Russell Road Food And Beverage, LLC *dba*
19 Crazy Horse 3 Gentlemen's Club, et al (“Defendant” and together with Plaintiff as
20 the “parties”), by and through their respective counsel, hereby submit this stipulation
21 for an extension of time for Plaintiff to respond to Defendant’s motion to dismiss.
22 Plaintiff’s complaint was filed on December 17, 2019 in state court. On January 17,
23 2020, Defendant removed and moved to dismiss. Plaintiff amended the complaint
24 on February 20 and Defendant filed the currently pending motion to dismiss on
25 March 5, 2020. ECF No. 16.

26 A hearing is currently set for April 27, 2020 at 3:00 PM.
27

1 In good faith and not for the purposes of delay, Plaintiff requested an
2 extension and the parties in good faith stipulate to allow additional time for Plaintiff
3 to respond to the motion and for Defendant to reply.

4 This is the first request for an extension of this deadline.

5 The parties therefore stipulate that Plaintiff's response to Defendant's motion
6 to dismiss shall be due on or before **April 2, 2020** and Defendant's reply shall be
7 due on or before **April 16, 2020**.

8 DATED: March 18, 2020.

9 **KIND LAW**

10
11 /s/ Michael Kind
12 Michael Kind, Esq.
13 8860 South Maryland Parkway, Suite 106
14 Las Vegas, Nevada 89123
15 *Attorney for Plaintiff John Doe (NY)*

16 **BENDAVID LAW**

17 /s/ Stephanie J. Smith
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21 Las Vegas, Nevada 89128
22 *Attorney for Defendant Russell Road Food*
23 *and Beverage, LLC dba Crazy Horse 3 Gentlemen's Club*

24 IT IS SO ORDERED:

25 
26 UNITED STATES DISTRICT JUDGE

27 Dated: March 19, 2020.